

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

AMBER D. HALL,)
Plaintiff,)
v.)
GESTAMP WEST VIRGINIA, LLC,)
BARRY HOLSTEIN, KENNETH) Civil Action No.: 2:20-cv-00146
SUPRENTANT & SCOTT HUGHES,)
Defendant.)

AFFIDAVIT OF SHONDELL HOUSTON

1. My name is Shondell Houston, I am over the age of 18 years old. I worked at Gestamp West Virginia, LLC between January 17, 2018 through January 2019.
2. I was hired in as a quality engineer. Upon hire my job description was changed to assistant quality manager.
3. I was asked by management to fire Annie Coleman. Kip Wiseman told me to fire Annie Coleman. Kip Wiseman told me to build documentation on Annie Coleman to get her terminated. I questioned Kip Wiseman as to why I needed to be the one to fire Annie Coleman. Kip Wiseman told me that Annie Coleman was telling Honda that Gestamp was producing bad parts.
4. Gestamp forced me to "track" Annie Coleman. I questioned Annie Coleman and made notes about her job, and walked around with Annie Coleman for days. I told Kip Wiseman that there was no way I would fire Annie Coleman because I thought she was a great worker and worked very hard.
5. Kip Wiseman pressed me to find reason to fire Annie Coleman.

6. I told Kip Wiseman that Annie Coleman was doing her job and there was no reason to fire her at all. I suggested that maybe Annie Coleman take some other classes, but quality supervisors and production managers kept pulling Annie Coleman out of the class to ensure the products were fine to ship because the men didn't know if the products were good to be shipped or not.
7. Annie Coleman requested help because her workload was expanding. Annie Coleman was forcing Annie Coleman in over weekends and 12+ hours a day. She was the only person that Gestamp forced to work these hours, and the men got to make their own schedules. But Annie Coleman couldn't make her own schedule, only the men could, even though she was in the same position as the men. Gestamp was trying to overwork Annie Coleman and exhaust her to force her to quit.
8. Annie Coleman told me she is sick, she was breaking out in hives from being overworked, that she's working more hours than many of the men combined, that she was throwing up, that she had to be medicated, was experiencing anxiety attacks, and a heart condition. I took Annie Coleman to Human Resources and told Human Resources that Annie Coleman had sought medical attention from a physician who had opined that Annie Coleman was suffering from anxiety, heart conditions, breaking out in hives due to stress, unable to sleep, and physically exhausted due to the up to seven (7) day a week schedule and working 12+ hours a day, while men worked well less. Men didn't have to come in early, men made their own schedules, men left early, men took

lunch – Annie Coleman never got to come in early, leave early, take lunch, or make her own schedule.

9. I reported Annie Coleman condition to Human Resources and Human Resources had “no solution”. Annie Coleman requested an accommodation of less hours, which was denied. Annie Coleman felt obligated to be at the plant on every shift because she was being called from every shift and told me she felt anxious and that if she didn’t come to the plant she would lose her job. Thus, despite me knowing that Annie Coleman asked for a doctor order accommodation of less hours, she got more calls, and was asked to come in more often leading to more medical conditions as communicated to me by Annie Coleman.
10. Annie Coleman constantly cried at work. I personally told Scott Hughes that Annie Coleman is overworked, she had medical issues from the work, and she has seen physicians that recommend less hours and would like to be accommodated to work less hours. Scott Hughes told me to hire some “people from Mexico” to help Annie Coleman. The people I hired didn’t even get to Annie Coleman they were forced to a different department. Thereafter, Annie Coleman was terminated, without getting any accommodation as requested.
11. Human Resources only investigated what it wanted to investigate when it wanted to fire someone. Specifically, Ryan Keyton sent an email to me about Annie Coleman. Ryan Keyton began screaming at me and being belligerent on the floor in front of many witnesses. Keyton said things like my “fucking team is

stupid". I reported Ryan Keyton's actions to Scott Hughes. Scott Hughes didn't investigate or even question Ryan Keyton.

12. I have knowledge of ongoing sexual harassment at Gestamp. Corey Myrick was in a sexual relationship with a subordinate female named Stacy Eyler who worked in quality control. Corey Myrick openly talked about the sexual relationship and I know for a fact that Scott Hughes knew about the relationship. I personally reported that Corey Myrick was in a sexual relationship with a subordinate (Stacy Eyler), and Corey Myrick became intoxicated and assaulted her, and strangulated her outside work and was arrested. I told Scott Hughes about the improper sexual relationship and about the attack. Scott Hughes did nothing about the incident. Scott Hughes allowed Corey Myrick to come back to work.

13. Kip Wiseman, plant manager, was having a sexual relationship with a female subordinate as well, Carla Donahue. I told Kip Wiseman that I didn't want the girl he was having sex with/living with (Carla Donahue) on my floor because she knew nothing about quality at all. Kip Wiseman wanted to give her a job because he was having sex with her and living with her. I personally asked Scott Hughes about the inappropriate relationship between Kip Wiseman, plant manager, and subordinate Carla Donahue having an open sexual relationship, and living together, Scott Hughes just smiled at me, and walked on by. Nothing was done by Scott Hughes or Gestamp about the relationship that per the handbook was improper as Carla Donahue was a subordinate to Kip Wiseman.

14. I have personal knowledge that Keith Kostlenic (unsure about spelling), used Gestamp credit card and illegally purchased books for a female in which he was involved in a sexual relationship. This was not a proper use of company credit card. Kip Wiseman talked to Keith Kostlenic about the purchase. The transaction was reported to Scott Hughes and noting was done. Gestamp's HR only investigated matters where Gestamp wanted to get rid of an employee, and totally ignored open and obvious violations on numerous occasions.

15. Dalene Perry was a quality supervisor. I have personal knowledge that Ms. Perry used FMLA for her daughter. Scott Hughes demoted Ms. Perry once she used her FMLA leave. After Ms. Perry used her FMLA leave Scott Hughes retaliated against her by demoting Ms. Perry. I have personal knowledge of this treatment as well. From what I personally witnessed while at Gestamp, if an employee uses FMLA leave he/she is demoted or terminated.

16. All my complaints to Human Resources fell on deaf ears. Scott Hughes never took any complaint wherein a female was complaining about sexual harassment issue from a man serious, unless he wanted to; and, in my experiences, and to my personal knowledge and observations, neither Gestamp, nor Hughes took disability concerns of female employees serious, or FMLA request from female employees serious. Gestamp and Hughes demonstrated a pattern of overlooking sexual harassment complaints when they didn't want to get rid of the person that was accused, and demonstrated a pattern of demoting or terminating employees that took time off for disability leave or FMLA leave. I experienced this personal as stated above.

17. Gestamp let Antoine Anderson get away with sexual harassment on an almost daily basis. There were complaints about Antoine Anderson sexual harassment all the time. I personally know that sexual harassment complaints were filed upon Antione Anderson on numerous occasions and Scott Hugues ignored them all. I personal witnessed Antione Anderson harass Darlene Perry. I personally went with Ms. Perry to complaint to Scott Hugues about Darlene Perry being sexually harassed by Antione Anderson, nothing was done, no investigation was completed. So, I was actually in front of Scott Hugues with Ms. Perry explaining the sexual harassments and how it was affecting Ms. Perry and nothing was done to Antione Anderson. Antione Anderson was making sexual comments to Ms. Perry and attempting to get her to engage in sexual acts in which she rejected – this was told to Hughes in my presence by myself and Ms. Perry. Antione Anderson's actions toward Ms. Perry were not welcome and did affect her and caused her anxiety and distress. I know that because Ms. Perry told me the same personally.

18. I personally also know that Sara Cook (female), Gestamp employee, also was in a sexual relationship with Antione Anderson. Antione Anderson approached her with sexual comments and requested sexual favors. I do also know for a fact personally that Sara Cook did engage in sexual actions including intercourse with Antione Anderson. I personality reported to Scott Hughes Antione Anderson was sleeping with Sara Cook, nothing was done. Antione Anderson also harassed Lisa Stoner. Lisa Stoner complained about Antione Anderson sexual harassment to Scott Hugues. I was there when Lisa Stoner

complained about Antione Anderson Sexual Harassment to Scott Hugues.

Nothing was done. No complaints, no investigation, and Antione Anderson still didn't get written up or fired.

19. At a time, prior to January 1, 2019 HR consisted of Scott Hughes (Head of HR), Katrine Kessler (HR Generalist/Assistant to Hughes), and Heather Dornife (HR Generalist). Erin Lambert, a male (Hourly Employee) and subordinate to Heather Dornife were involved in an open sexual relationship that HR/Hughes know about. Since Heather Dornife was in HR, it is my understanding that she couldn't date/be in a sexual relationship with an hourly employee. But I personally know she was and that Hugues know about the relationship.

20. I personally know that Annie Coleman was accused of taking a facebook screen shot depicting a photo of Heather Dornife and Erin Lamber together. Annie Coleman was reprimanded for allegedly taking the screen shot of a public photograph and targeted again by HR. I felt this was another mounting attack against Annie Coleman who had already disclosed her medical condition to Gestamp and I personally told Scott Hugues these actions just caused Annie Coleman – who already suffered from known anxiety – more distress and more anxiety. Scott Hughes took no action of the harassing attacks upon Annie Coleman, and didn't even investigate the matter.

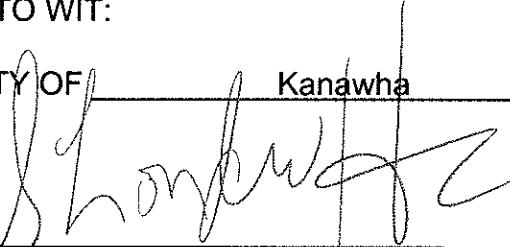
21. I have personal knowledge, and personally observed the following: on one shift, in the afternoon, after lunch, around 1:20 PM – 1:45PM, while I was looking for one of my engineers, I saw Carla Donahue (female) sitting on the lab of a manager named Bill (I cannot recall his last name). Carla Donahue was an

hourly employee and Bill was a manager/supervisor so a superior to Carla Donahue. I told Carla Donahue to get off his lab because the action was completely inappropriate. Both Donahue and Bill laughed at me. I personally reported the inappropriate actions to Scott Hughes; Hughes did nothing about the actions which were deemed inappropriate according to the Gestamp Handbook.

22. I also have personal knowledge of the following: Kip Wiseman and Keith Kostlenic (unsure about spelling of last name) used the Gestamp company credit card for personal purchases on many occasions including Wiseman using the card to pay for party supplies for another employee's granddaughter, and Kostlenic buying his girlfriends books off Amazon. I reported this action to HR as well and Hugues replied "that's not true". When I had personal knowledge that it was true and did happen.

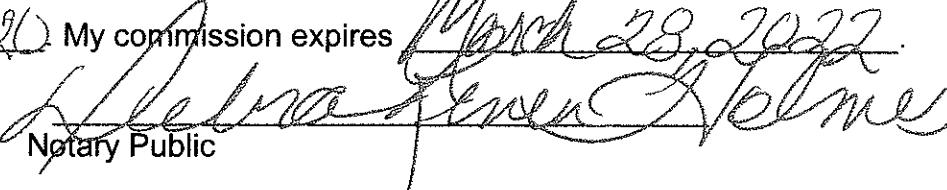
TO WIT:

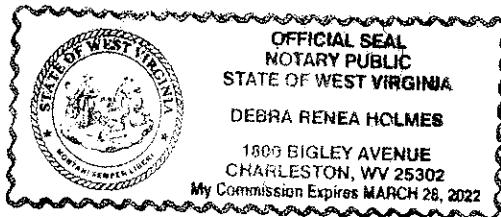
COUNTY OF Kanawha STATE OF WV


Shondell Houston, Dated - 11/19/20

Taken, subscribed and sworn to before me this 19th day of November

2020 My commission expires March 28, 2022.


Debra Renea Holmes
Notary Public



IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

AMBER D. HALL,

Plaintiff,

v.

Civil Action Number: 2:20-cv-00146
Judge: John T. Copenhaver, Jr.

**GESTAMP WEST VIRGINIA, LLC,
BARRY HOLSTEIN,
KENNETH SUPRENANT,
& SCOTT HUGHES,**

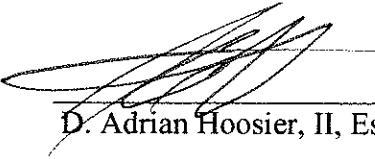
Defendants.

CERTIFICATE OF SERVICE

I, D. Adrian Hoosier, II, counsel for Plaintiff, do hereby certify that I have served the foregoing ***AFFIDAVIT OF SHONDELL HOUSTON***, via United States District Court E-filing, on this the 20th day of November, 2020, to the following:

Hendrickson & Long, PLLC
Attention: Raj A. Shah
Post Office Box 11070
Charleston, West Virginia 25339

Burr & Forman, LLP
Attention: Ronald W. Flowers, Jr.
420 North 20th Street, Suite 3400
Birmingham, Alabama 35203


D. Adrian Hoosier, II, Esquire WVS#10013